

# Exhibit A

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

In re *Ex Parte* Application of James T. H. Deaver, as EXECUTOR OF THE ESTATE OF BRENT SIKKEMA, deceased, pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings )  
)  
) Case No. \_\_\_\_\_  
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)

**[PROPOSED] ORDER GRANTING APPLICATION OF JAMES T. H. DEEVER, AS EXECUTOR OF THE ESTATE OF BRENT SIKKEMA, DECEASED, PURSUANT TO 28 U.S.C. § 1782 TO CONDUCT DISCOVERY FOR USE IN FOREIGN PROCEEDINGS**

This case comes before the Court on the *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings (the “**Application**”), filed by Petitioner James T. H. Deaver, as Executor of the Estate of Brent Sikkema, on January 9, 2025. The Court, having reviewed the Application, the Memorandum of Law in support thereof, the Declaration of Gonzalo S. Zeballos, the Declaration of James T. H. Deaver, together with the exhibits attached thereto, and the proposed subpoenas, finds that (1) the statutory requirements of 28 U.S.C. § 1782 are satisfied, and (2) the factors identified by the Supreme Court of the United States in *Intel Corp. v. Advanced Micro Devices, Inc.*, 542 U.S. 241 (2004), weigh in favor of granting Petitioner’s Application.

It is therefore ORDERED that Petitioner is granted leave to serve the subpoenas attached as Exhibits B–E to the Application on The Western Union Company; Charter Communications, Inc.; Google LLC; and Yahoo Inc., respectively.

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2025

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JUDGE